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December 6, 2022

Hon. Colleen McMahon
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

By Electronic Filing.

Re: In Re: New York City Policing During Summer 2020 Demonstrations,
20-cv-8924 (CM)(GWG) –

This filing is related to Hernandez, 21-cv-7406 and Minett, 21-cv-8161

Dear Judge McMahon:

MEMO ENDORSED

My firm and co-counsel represent the Plaintiffs in *Hernandez, et al. v. City of New York, et al.*, and *Minett v. City of New York, et al.*, which were consolidated into the *In Re: New York City Policing During Summer 2020 Demonstrations*, 20-cv-8924 (CM)(GWG) docket for discovery purposes. Both *Hernandez* and *Minett* resolved on a Rule 68 offer, each of which also provided for attorneys' fees.

The parties jointly ask for a further 45-day extension of time for plaintiffs in both *Hernandez et al.* and *Minett* to move for fees, so they may have more time to attempt to resolve the appropriate amount without litigation. Previously the Court set a deadline for plaintiffs to serve a demand by October 18, 2022, which they did. See *Hernandez*, Dkt. No. 36. The parties are now engaged in productive discussions and are hopeful they can resolve this issue without court intervention.

Given that, we ask the Court to grant an extension of the time until January 23, 2022 for Plaintiffs to file the fee applications in both *Minett* and *Hernandez* pursuant to the relevant Rule 68 offers.

As always, we thank the Court for its continued time and attention.

Respectfully submitted,

/s/

Elena L. Cohen

Honorific/ Pronouns: Ms., she/ her/ her

COHEN & GREEN P.L.L.C.

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cc:

All relevant parties by electronic filing.